

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

BRIAN MUHLBAIER and ELIZABETH  
MUHLBAIER,

Plaintiffs,

v.

SPECIALIZED LOAN SERVICING LLC,

Defendant.

CIVIL ACTION NO. 1:18-cv-00125-RBK-JS

**DEFENDANT SPECIALIZED LOAN SERVICING LLC'S  
NOTICE OF MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

TO: Kit Applegate, Esq.  
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Vincentown, NJ 09088

Phillip B Seaton  
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309 Fellowship Rd, Ste 200  
Mount Laurel, NJ 08054

*Attorneys for Plaintiffs*

PLEASE TAKE NOTICE that on February 19, 2018, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorney for defendant Specialized Loan Servicing LLC ("SLS") will move before the United States District Court for the District of New Jersey, the Honorable Robert B. Kugler presiding, at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101, for an Order dismissing plaintiffs' complaint pursuant to Federal Rules of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying memorandum of law in support of this motion.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is attached hereto.

DATED: January 25, 2018

/s/ Daniel C. Fanselle

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